

EXHIBIT 13

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF TEXAS
3 HOUSTON DIVISION
4 IN RE: ALTA MESA)
5 RESOURCES, INC.) Case No.: 4:19-cv-00957
6 SECURITIES LITIGATION)
7

8 VIRTUAL VIDEOTAPED DEPOSITION OF
9 TIM TURNER
10 March 23, 2023

11
12 VIRTUAL VIDEOTAPED DEPOSITION OF TIM TURNER,
13 produced as a witness at the instance of the Class
14 Plaintiffs and duly sworn, was taken in the
15 above-styled and numbered cause on the 23rd day of
16 March, 2023, from 9:10 a.m. to 6:20 p.m., before
17 Vickie G. Hildebrandt, Certified Shorthand Reporter
18 in and for the State of Texas, reported by
19 computerized stenotype machine with the witness
20 located in Houston, Texas, pursuant to the Federal
21 Rules of Civil Procedure and the provisions stated on
22 the record or attached hereto.

[PAGES OMITTED]

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1 Q. What is the Gen 2.0 type curve?

2 A. We had different completion procedures as --
3 as we started, you know, drilling wells and -- and
4 testing, you know, what the optimum completions were.
5 The -- the -- the Gen 1.0 was -- was 12 frac stages
6 in a, you know, 4800-foot lateral. Gen 1.5 was 18.
7 I believe Gen 2 was up to about 24 and then our final
8 was a Gen 2.5 and I can't remember, it was a -- it
9 was a similar number of stages but I think we
10 changed -- might -- might have put larger fracs on
11 the Gen 2.5. You would have to check me on that,
12 though. I -- I don't remember exactly but anyway, so
13 Gen 2.0 refers to 24-stage completion.

14 MR. BERGER: Hey, Brendan, just for
15 the record, the graphic in the E-mail is not legible
16 on our end so if you're going to ask him about what's
17 in the graphic, we can't read it so we can read the
18 text of the E-mail but we -- the -- the text that's
19 in the -- the -- I guess it's a slide, it's not
20 legible on our -- our end.

21 MR. BRODEUR: Yeah. Thank you. The
22 graphic is not legible as -- as produced other than
23 the headers but I -- I don't have questions
24 specifically about the graphic.

25 MR. BERGER: Okay. Well, to the

[PAGES OMITTED]

1 A. I don't know but it's clearly one of their
2 conclusions.

3 Q. Earlier in Mr. Chappelle's E-mail, he starts --
4 actually the preceding paragraph with, Empirically,
5 we've built quite a learning curve with our first seven
6 pattern tests across our footprint.

7 Do you see that?

8 A. Yes.

9 Q. We looked at Exhibit 186 which showed five
10 pattern tests.

11 Do you know what the other two pattern
12 tests were for?

13 A. I don't.

14 Q. Do you -- could -- could those be two pattern
15 tests that as of your prior E-mail in Exhibit 0186 did
16 not yet have enough production data to calculate
17 estimated ultimate recovery?

18 MR. BERGER: Objection, form.

19 A. Very well, yes. I mean, if -- if -- if I
20 didn't include it in my analysis, it either wasn't
21 producing or it didn't have enough data to -- to draw
22 any conclusions from it.

23 Q. Okay. Going back to the -- the Schlumberger
24 presentation, do you remember who was -- who attended?

25 A. Oh, gosh, the -- we have a -- we had a big

[PAGES OMITTED]

1 the -- the wells, how they're developed and in the
2 different benches, there were a couple of cases in
3 particular where the lowest -- lowermost interior
4 wells were the ones that didn't come back immediately
5 and it would be misleading to say, those being
6 interior wells, that you wouldn't get, you know, oil
7 from those and, you know, even the rest of the wells,
8 you don't report them until they start making oil,
9 you know -- you know, in a consistent fashion so it
10 would be misleading to include those until they
11 unloaded all the water and we, in fact, saw that in a
12 couple of places where we installed ESPs and pulled
13 that water out at a faster rate, we got improvement
14 in the -- in the other wells by pulling the water but
15 then we also saw oil hit those lower wells -- lower
16 central wells faster as well.

17 Q. Okay. Is -- is that sort of lower production
18 from central wells something that you would have
19 expected to see in other patterns going forward?

20 A. I don't know if expected is -- is the right
21 word but it's certainly something to watch for.

22 Q. What was your criteria for whether to remove a
23 well from the average?

24 MR. BERGER: Objection, form.

25 A. Whether it was consistently making oil, for

1 one, but then also is if it was, you know, anywhere
2 close to any of the offset wells. I mean, they --
3 they should mimic each other to a certain extent.

4 Q. You didn't use any sort of written criteria or
5 parameters for deciding which wells to exclude, correct?

6 A. No, uh-uh.

7 I mean, there -- nothing internally
8 but then there was -- there's -- there's no guidance
9 in the industry or the -- or the SEC.

10 Q. Did the fact that interior wells were slower to
11 produce oil indicate to you that there was communication
12 between the wells within the development patterns?

13 A. That would make sense based on the volumes
14 they -- they produced which, you know, when you
15 induce hydraulic fractures across a -- a set of wells
16 in -- in multiple what we call benches, you would
17 expect the -- there's some other references to SRV,
18 which is stimulated rock volume, you would expect all
19 of those wells to connect up. It's like if you've
20 ever seen, you know, pictures of how, you know, rock
21 in a -- in a mine, say, is -- is dynamited, they --
22 they put it in a -- in a wine rack similar to what --
23 what we have in our wells here and then explode those
24 and, you know, crumble up all the rock as much as
25 possible and then they end up, you know,

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